



June 14, 2007

Mr. Kevin Martin
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 07-52

Dear Chairman Martin and Commissioners,

I appreciate the opportunity to participate in the **Notice of Inquiry (NOI)** on broadband industry practices (**WC Docket No. 07-52**).

I am pleased to offer my observations which are based on a long career in the cable industry and now as the CEO of The Employment & Career Channel. Also as the co-founder of National Association of Minorities in Cable (NAMIC) I have been very active in efforts to encourage more minority ownership, employment and content creation in the media industry.

The Employment & Career Channel (TECC) is a multimedia enterprise that creates and distributes employment and career development content in a digital video format for television and the Internet. TECC's video programming is highly relevant, informative, entertaining and timely. It is designed to serve all workers, from first-time job seekers to high-income professionals and executives.

Our video programming covers a wide range of topics related to work. We provide useful information to those seeking a job, keeping a job and enjoying their job. The network offers career development, training opportunities, workplace lifestyle features, news and other information that affects employment and career opportunity.

For TECC, encouraging investment in broadband infrastructure capable of delivering high quality video is very important to our ability to reach people whose lives are improved by our career oriented programming. We are the type of business that benefits from new investment in broadband, IPTV and mobile broadband. While we are price sensitive to the cost of our bandwidth needs, we are confident that robust competition between cable, wireless and broadband providers is the best defense against bandwidth price pressure for our network and our customers.

The promise of a new video paradigm, where the user is given virtually unlimited choices is a sustaining ray of hope for independent and minority owned television networks. It offers a way to break out of the capacity constraints of traditional video systems and the grip of consolidated media ownership. This emerging media environment not only offers new ways to reach viewers, it can force traditional media to expand capacity and enhance program diversity.

As the Federal Communications Commission (FCC) considers requests to add new regulation to the broadband video market, it should ask a few simple questions. Will the action be more likely or less likely to spur investment in much needed broadband infrastructure? Will it provide more or less opportunities for media diversity? Will it encourage new innovation? It is my belief that over regulation can chill investment in new broadband platforms as it once did in the cable arena. It should be a national priority that investment, innovation and diversity are encouraged and network operators is allowed to intelligently manage their networks to ensure that the video over broadband experience meets and exceeds customer expectations.

A “dumb pipe” network ethic means that the ones who can flood the infrastructure will win. For small, emerging, independent and minority programmers that is an environment which will drown opportunity. Many of us have already been swimming against the tide of media consolidation. New video platforms, intelligent networks and consumer empowering technologies require investment and offer the unaffiliated content providers improved and reliable access to viewers.

Increased broadband capacity and new video broadband offerings are at last bringing much needed video competition. These new broadband platforms have also been more welcoming of minority and independent programmers.

The FCC should avoid any regulatory action which would create new barriers to broadband investment or media diversity

Sincerely,

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